

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

DAKOTA BURCHARD, )  
                        )  
Plaintiff,           )  
                        )  
v.                    )  
                        )  
CORECIVIC OF TENNESSEE, LLC, ) Civil Action Number 3:23-CV-455  
TROUSDALE COUNTY, TENNESSEE, ) District Judge William L. Campbell, Jr.  
LYBRUNCA COCKRELL, CORTNEY ) Magistrate Judge Alistair E. Newbern  
CRAWFORD, MARTIN FRINK,     )  
JERMARIS PORTER, and JANE ) Jury Demand  
WRIGHT,                )  
                        )  
Defendants.           )

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**JOINT MOTION TO MODIFY INITIAL CASE MANAGEMENT ORDER**

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Plaintiff Dakota Burchard and Defendants CoreCivic of Tennessee, LLC, Trousdale County, Tennessee, Lybrunca Cockrell, Cortney Crawford, Martin Frink, and Jermaris Porter respectfully move the Court to modify two deadlines that are contained in the Initial Case Management Order, specifically: (1) the fact discovery deadline from May 14, 2024, to July 1, 2024; and (2) the case resolution plan and joint status report deadline from May 28, 2024, to July 15, 2024. As grounds for this Motion, the parties state as follows:

1.       The parties have engaged in written discovery, have produced documents, and are scheduled to take various depositions in this matter over the coming weeks.
2.       Given the schedules of counsel and the witnesses, some of these depositions must take place after the current May 14, 2024, discovery deadline. Along with this, the parties are working to secure medical records from offsite third-party providers.

3. Therefore, the parties respectfully move the Court to modify the discovery deadline from May 14, 2024, to July 1, 2024, and the case resolution plan and joint status report deadline from May 28, 2024, to July 15, 2024.

4. The parties are not requesting that the Court modify any of the other deadlines in the Initial Case Management Order, and those deadlines will remain as follows:

| DEADLINE                      | DATE               |
|-------------------------------|--------------------|
| Plaintiff's Expert Disclosure | July 15, 2024      |
| Defendants' Expert Disclosure | September 16, 2024 |
| Expert Depositions            | October 15, 2024   |
| Dispositive Motions           | November 14, 2024  |
| Trial Date                    | June 3, 2025       |

(Docket Entries 14 and 15).

5. The requested enlargement will not impact the dispositive motion deadline and will not cause the dispositive motion deadline, including any response and reply briefs, to be later than 120 days in advance of the trial date.

6. The requested modifications to the Initial Case Management Order will not prejudice any of the parties and instead will allow them to complete fact discovery and secure additional medical records. As a result, good cause exists under Federal Rule of Civil Procedure 16(b)(4) to modify the case management deadlines in the manner requested.

For these reasons, the parties respectfully move the Court to modify certain deadlines in the Initial Case Management Order, specifically: (1) the fact discovery deadline from May 14, 2024, to July 1, 2024; and (2) the case resolution plan and joint status report from May 28, 2024, to July 15, 2024.

Respectfully submitted,

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